

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SANDRA KURTZ,)	
Plaintiff,)	
)	Case No.: 3:06-1209
vs.)	
)	JUDGE NIXON
DEPARTMENT OF ARMY,)	MAGISTRATE JUDGE KNOWLES
SECRETARY OF THE ARMY,)	
FRANCIS J. HARVEY,)	
Defendant.)	JURY DEMAND

**MOTION TO EXTEND DISCOVERY DEADLINE
AND TO RESPOND TO MOTION TO DISMISS**

Comes the Plaintiff, SANDRA KURTZ, by and through her attorney Robert J. Martin, and hereby move this Honorable Court to Extend the discovery deadline and to extend the deadline to respond to Motion to Dismiss and for cause would state or aver as follows:

1. The parties have been working together scheduling and taking depositions;
2. The parties had depositions scheduled on February 27, 2008, and due to the weather some of the deponents were unable to attend; and,
3. Plaintiff's counsel and Defendant's counsel are working to schedule depositions by agreement.

WHEREFORE, the parties moves to extend the deadlines to March 28, 2008,
which will not prejudice either party or compromise the trial date.

Respectfully Submitted by:

/s/ Robert J. Martin
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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing has been sent via electronic filing to the Honorable Michael Roden, United States Attorney, 9th Avenue South, Suite A-961, Nashville, TN 37203, on this the 7th day of March 2008.

/s/ Robert J. Martin
Robert J. Martin

Granted
[Signature]